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J. PAUL OETKEN United States District Judge

July 10, 2025

BY ECF

Honorable J. Paul Oetken United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

> Re: USA v. Nunez, et al. Case No. 22-cr-293 (JPO)

Dear Judge Oetken:

I am the CJA-appointed counsel for defendant Jesus Zapata in the above-captioned matter. I write the Court to request an adjournment of the Pre-Sentence Interview ("PSI") deadline from July 14, 2025 to July 24, 2025. The original PSI was scheduled for July 11, 2025; however, due to an unanticipated urgent scheduling conflict defense counsel can no longer appear. Defense counsel has spoken with the assigned SDNY U.S. Probation Officer assigned to Mr. Zapata regarding this.

Additionally, the defense is requesting that the following disclosure deadlines be adjourned by two (2) weeks as follows:

- First Disclosure from 08/08/2025 to 08/22/2025
- Second Disclosure from 09/08/2025 to 09/22/2025

These deadlines will not affect Mr. Zapata's sentencing date, which is presently scheduled for October 20, 2025.

This is the first request for an adjournment of the PSI. The Government consents to this request for an adjournment.

Respectfully Submitted,

Andrew M. J. Bernstein

Partner

Fox Rothschild LLP

Attorney for defendant Jesus Zapata